

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

In re:

TAKISHA L HILL * **Case No. 13-30474-RAG**

* **Chapter 13**

Debtor *

* * * * *

**TRUSTEE'S OBJECTION TO
CONFIRMATION OF CHAPTER 13 PLAN**

Ellen W. Cosby, Trustee, objects to confirmation of the Debtor's plan filed March 4, 2014 for reason stated below:

Previous Objections:

1. The Debtor has failed to resolve the Trustee's original Objection of January 10, 2014. Specifically, the Debtor continues to fail to provide current documentation of income of the co-owner of the home and amend Schedules I and J to disclose full household income and expenses.
2. Counsel's certificate of service of the amended plan fails to comport with the requirements of LBR 7005-2.
3. The amended plan fails to set out a full schedule of Equal Monthly Payments required in paragraph 2.e.iii.
4. Presuming a \$20,000 priority Maryland tax debt, as indicated by Schedule E, the plan is materially under-funded.
5. A current, executed Pre Confirmation Certificate has not been filed. Pursuant to LBR 3015-2(c) the Debtors must file a Pre-Confirmation Certificate within seven days prior to the Confirmation Hearing.

Dated: March 28, 2014

/s/ Ellen W. Cosby

Ellen W. Cosby, Trustee
300 E. Joppa Road, #409
Towson, MD 21286
inquiries@ch13balt.com
(410) 825-5923

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 28, 2014 copies of this Objection were delivered electronically through ECF to DAVID H SANDLER, ESQ and mailed by first-class mail, postage prepaid, to:

TAKISHA L HILL
9060-A MOONSHINE HOLLOW
LAUREL, MD 20723

/s/ Ellen W. Cosby
Ellen W. Cosby, Trustee